

## UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

## In the Matter of the Search of

(Briefly describe the property to be searched  
or identify the person by name and address)

Priority Mail Express, Label Number, EE 401637815 US, addressed  
to Maggie Stewart, 3548 Brotherton rd. #10, Cincinnati, OH 45209  
with a return address of Shawn Carter, 6330 Laurel Canyon blvd,  
North Hollywood, CA 91606.

Case No.

1:19MJ-111

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Priority Mail Express, Label Number, EE 401637815 US (See Attachment "A")

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

Controlled Substances, materials and documents reflecting the distribution of controlled substances through the U.S. Mails, including money and/or monetary instruments paid for controlled substances

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☐ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.


The search is related to a violation of: Title 21

Code Section	Offense Description
21 U.S.C. 846	Conspiracy to distribute a controlled substance
21 U.S.C. 841 (a) (1)	Possession with intent to distribute a controlled substance
21 U.S.C. 843 (b)	Use of a Communication Facility

The application is based on these facts:

See attached affidavit of U.S. Postal Inspector Andrew W. Kremer

- ☒ Continued on the attached sheet.  
☐ Delayed notice \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

  
Applicant's signature

Andrew W. Kremer, United States Postal Inspector  
Printed name and title

Sworn to before me and signed in my presence.

Date: 2/15/19

City and state: Cincinnati, Ohio

  
Judge's signature

Karen L. Litkovitz  
United States Magistrate Judge  
Printed name and title



### AFFIDAVIT

I, Andrew W. Kremer, having been duly sworn, depose and state:

1. I am a United States Postal Inspector, having been so employed since May 19, 2012. I am presently assigned to the Cincinnati Field Office, Pittsburgh Division of the United States Postal Inspection Service (USPIS) with investigative responsibility for southwest Ohio and northern Kentucky. Part of my investigative responsibility involves the use of the United States Mail in the illegal transporting of narcotics and other dangerous controlled substances and financial proceeds relating thereto.
2. Your Affiant completed United States Postal Inspection Service Basic Training in May 2012. The training involved narcotic investigation techniques, chemical field tests and training in the detection and identification of controlled substances being transported in the United States Mail. In addition to this formal training, your Affiant has worked since May 2012 with various federal, state and local law enforcement agencies in the investigation of the transportation of illegal drugs and their identification.
3. This Affidavit is made in support of a search warrant for the following properties, namely packages associated with the following United States Postal Service (USPS) Priority Mail Express, Label Numbers:
  - a. **EE 401637829 US (Package 1)**
  - b. **EE 401637815 US (Package 2)**

as further described in Attachment A. This affidavit is made in support of a warrant to search the packages for evidence of a crime as well as contraband, fruits of a crime or other items illegally possessed in relation to the following offenses:

- a. Possession with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, § 841,
- b. Use of a Communication Facility, in violation of Title 21, United States Code, § 843(b), and
- c. Conspiracy to Possess with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, § 846.

Because this affidavit is submitted in support of the application of the United States to search the packages, it does not include every fact known concerning this investigation, I have set forth facts and circumstances that I have relied upon to establish probable cause to justify the issuance of a warrant to search the above-described packages. The packages are currently located at the USPIS Cincinnati Field Office.



4. Your Affiant has become aware that drug traffickers frequently use Priority Mail Express and/or Priority Mail, services offered by the USPS, to transport narcotics and other dangerous controlled substances. As a result of investigations and successful controlled substance prosecutions where Priority Mail Express and/or Priority Mail were used, your Affiant has learned of certain characteristics indicative of other Priority Mail Express and/or Priority Mail items previously identified as containing narcotics or other dangerous controlled substances. Some of these characteristics include, but are not necessarily limited to or used on every occasion - false or non-existent return address, addressee is not known to receive mail at the listed delivery address, the package is heavily taped, the package is mailed from a known drug source location, labeling information contains misspellings, the label contains an illegible waiver signature, unusual odors emanating from the package, and the listed address is located in an area of known or suspected drug activity.
5. On February 14, 2019, during a review of postal mailings, your Affiant identified and intercepted two packages at the USPS Processing and Distribution Center, Cincinnati, Ohio.

The packages are further described as:

**Package 1:**

**Priority Mail Express, Label Number:** EE 401637829 US

**Sender:** 513-301-5969  
G. McDay  
11610 Oxnard St  
North hollywood, CA 91606

**Addressee:** 513-301-5969  
Tashae and Liara  
1220 Chesterdale dr. #C  
Cincinnati, Ohio 45246

**Package 2:**

**Priority Mail Express, Label Number:** EE 401637815 US

**Sender:** Shawn Carter  
6330 Laurel Canyon blvd  
North Hollywood, CA 91606

**Addressee:** Maggie Stewart  
3548 Brotherton rd. #10  
Cincinnati, OH 45209

6. Observation and USPS tracking information of the above listed Priority Mail Express packages, by your Affiant indicated they were mailed from the Chandler Post Office, North Hollywood, California 91601, at the same time, and paid for in the same transaction. Observation of the package indicates the handwriting of the USPS labels were not pictorially similar. However, each package also contains additional non-USPS labels with the sender and addressee information, and those labels do have pictorially similar handwriting.
7. The Consolidated Lead Evaluation and Reporting (CLEAR) database system was researched by your Affiant regarding the listed return address of Package 1; 513-301-5969, G. McDay, 11610 Oxnard St, North hollywood, CA 91606. CLEAR is a public record data investigative platform available exclusively to law enforcement and other government investigators about people and businesses. The information obtained from the system indicated there is no G. McDay associated with that address. Your Affiant also queried the phone number and the system indicated that phone number is associated to a Gary McDay.
8. The CLEAR database was researched by your Affiant regarding the addressee of Package 1; 513-301-5969, Tashae and Liara, 1220 Chesterdale dr. #C, Cincinnati, Ohio 45246. The information obtained from the system indicated there is no Tashae or Liara associated with that address. The non-USPS label on the package has the package addressed to Tashae and Liara McDay. The CLEAR database was researched by your Affiant, and the system indicated there was no McDay associated at that address.
9. The CLEAR database was researched by your Affiant regarding the listed return address of Package 2; Shawn Carter, 6330 Laurel Canyon blvd, North Hollywood, CA 91606. The information obtained from the system indicated there is no Shawn Carter associated with that address.
10. The CLEAR database was researched by your Affiant regarding the addressee of Package 2; Maggie Stewart, 3548 Brotherton rd. #10, Cincinnati, OH 45209. The information obtained from the system indicated there was a Maggie Stewart associated with that address in July 2018.
11. On February 14, 2019, your Affiant arranged for Officer Mike Harper, Cincinnati Police Department, for a narcotics canine to check the packages. Officer Harper and his canine "Cairo" are a currently certified narcotics team. The team is certified by the Ohio Peace Officer Training Commission and the Office of the Attorney General (Ohio). Officer Harper reports that "Cairo" passed all of his examinations and has successfully located hidden drugs in the past, and therefore your Affiant considers "Cairo" to be reliable. On the same date, your Affiant met Officer Harper at the USPIS Office, Cincinnati, Ohio, where the packages listed above was placed in separate rooms among several other similar packages and presented to narcotic canine, "Cairo", who alerted positively to the presence or odor of a controlled substance upon the USPS packages described below:

a. **Priority Mail Express, Label Number: EE 401637829 US**

b. **Priority Mail Express, Label Number: EE 401637815 US**

Attached herewith, and incorporated by reference, is a photocopy of the narcotic canine handler's record of examination.

12. Based upon my experience and training, this information, along with the positive alert of narcotic canine "Cairo" is indicative of the packages containing narcotics or proceeds relating thereof.
13. Based upon the information contained in this affidavit, your Affiant believes that there is probable cause to believe that the packages described below will contain evidence and/or contraband, fruits of crime, or other items illegally possessed:

a. **Priority Mail Express, Label Number: EE 401637829 US**

b. **Priority Mail Express, Label Number: EE 401637815 US**

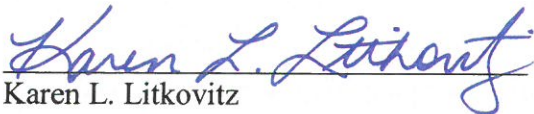
Therefore, a search warrant to open the packages is requested.

Further, your Affiant sayeth naught.



Andrew W. Kremer  
United States Postal Inspector

Subscribed and sworn to and before me this 15 day of February, 2019



Karen L. Litkovitz  
United States Magistrate Judge



**ATTACHMENT A**  
**PROPERTY TO BE SEARCHED**

The property to be searched is the package associated with **Priority Mail Express, Label Number: EE 401637815 US**, addressed to Maggie Stewart, 3548 Brotherton rd. #10, Cincinnati, OH 45209, with a return address of Shawn Carter, 6330 Laurel Canyon blvd, North Hollywood, CA 91606.



United States Postal Inspection Service  
Pittsburgh Division

### OFFICER AFFIDAVIT


I, OFFICER MIKE HARPER, AM, AND HAVE BEEN, EMPLOYED BY THE CINCINNATI POLICE DEPARTMENT, SINCE 2001. AMONG OTHER DUTIES, I AM CURRENTLY THE ASSIGNED HANDLER OF NARCOTICS DETECTION CANINE "CAIRO", WHICH IS TRAINED AND CERTIFIED IN THE DETECTION OF THE PRESENCE OR ODOR OF NARCOTICS DESCRIBED AS FOLLOWS:

**Marijuana, Hashish, Cocaine, Heroin, Methamphetamines, Ecstasy**

ON 2/14/2019, AT THE REQUEST OF POSTAL INSPECTOR A.W.KREMER, I RESPONDED TO THE USPIS OFFICE, CINCINNATI, OH, WHERE "CAIRO" DID ALERT TO AND INDICATE UPON THE FOLLOWING DESCRIBED ITEM:

USPS Priority Mail Express, Label Number: EE 401637815 US, addressed to Maggie Stewart, 3548 Brotherton rd. #10, Cincinnati, OH 45209, with a return address of Shawn Carter, 6330 Laurel Canyon blvd, North Hollywood, CA 91606.

BASED ON MY TRAINING AND EXPERIENCE AND THAT OF "CAIRO", I CONSIDER THE ABOVE DESCRIBED ITEM TO CONTAIN WITHIN OR UPON THE PRESENCE OR ODOR OF A NARCOTIC OR OTHER DANGEROUS CONTROLLED SUBSTANCE.

 2/14/19  
(Signature and Date)